

**SHAPIRO & ASSOCIATES PLLC**

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*Attorneys for Defendant*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FLAWLESS STYLE LLC AND FLORIDAHUSKER  
LLC,

Plaintiffs,

- against -

SAADIA GROUP LLC

Defendant.

No. 1:23-cv-2354-JHR

Hon. Jennifer H. Rearden

**NOTICE OF CROSS-  
MOTION FOR  
SANCTIONS**

**PLEASE TAKE NOTICE**, that upon the Declarations of Saadia M. Shapiro, Jack Saadia, Jackie Huang, the accompanying Memorandum of Law, and all previous filings and proceedings had herein, Defendant Saadia Group LLC (“Defendant”) shall move this Court, before the Honorable Jennifer H. Rearden at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, Courtroom 12-B, on a date and time as directed by the Court, for an Order pursuant to Rule 11(b) and 11(c)(1) of the Federal Rules of Civil Procedure that (i) Plaintiffs’ motion was being presented for the improper purpose, such as to needlessly increase the cost of litigation, and (ii) imposing Sanctions upon the Plaintiffs and (iii) granting Defendants such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Civil Rule 6.1(b)(2), any opposing affidavits and answering memoranda shall be served within fourteen (14) days after service of the moving papers.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Civil Rule 6.1(b)(3), any reply affidavits and memoranda of law shall be served within seven (7) days after service of the opposing and answering papers.

Defendant has not made any prior application for the relief requested.

Dated: New York, New York  
December 21, 2023

SHAPIRO & ASSOCIATES PLLC

By: /s/ Saadia M. Shapiro  
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